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JAN - 5 1998

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January 5, 1998

Ms. Magalie R. Salas
Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

VIA HAND DELIVERY

Re: WT Docket No. 97-112; Cellular Service and Other Commercial Mobile Radio
Services in the Gulf of Mexico
EX PARTE MEETING

ERRATUM

Dear Ms. Salas:

On November 12, 1997, an ex parte meeting was held between Jack Richards and Brian Ashby, representatives of Shell Offshore Services Company ("SOSCo"), and David Furth, Wilbert Nixon, and Linda Chang of the Federal Communications Commission ("Commission"). The purpose of the meeting was to explain SOSCo's position with respect to the above-captioned proceeding, and a "talk sheet" summarizing SOSCo's position was distributed during the meeting. A letter providing notice of the ex parte meeting was filed with the Commission later that day, but a "talk sheet" from another ex parte meeting, not the subject meeting, was attached to the letter by mistake.

The purpose of this letter is to correct the mistake. A copy of the November 12, 1997, letter providing notice of the ex parte meeting, as well as the correct "talk sheet," is attached hereto to replace the earlier-filed letter and "talk sheet."

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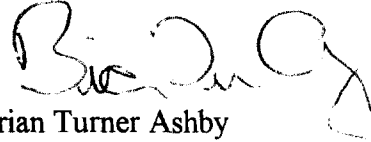
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Ms. Maraglie R. Salas
January 2, 1998
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We apologize for the mistake and any inconvenience it may have caused. Should there be any questions or a need for additional information, please communicate directly with the undersigned telecommunications counsel for SOSCo.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Turner Ashby". The signature is stylized with large, flowing loops and a long horizontal stroke at the end.

Brian Turner Ashby

Enclosure

EX PARTE OR LATE FILED

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November 12, 1997

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William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

VIA HAND DELIVERY

Re: WT Docket No. 97-112; Cellular Service and Other Commercial Mobile Radio
Services in the Gulf of Mexico
EX PARTE MEETING

Dear Mr. Caton:

The purpose of this letter is to provide notice that, on November 12, 1997, Jack Richards and Brian Ashby, representatives of Shell Offshore Services Company ("SOSCo"), met with David Furth, Chief of the Commercial Wireless Division, to discuss the above-captioned proceeding. Wilbert Nixon and Linda Chang, attorneys in the Auctions Division, also were present at the meeting.

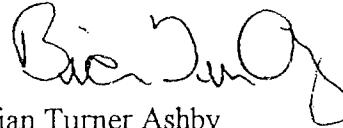
The discussion concerned the Federal Communications Commission's ("Commission's") proposal to license non-cellular Commercial Mobile Radio Service ("CMRS") spectrum in the Gulf of Mexico. As representatives of SOSCo, a telecommunications service provider active in the Gulf of Mexico and an affiliate of the largest petroleum and natural gas producer in the Gulf of Mexico, we expressed our belief that the Commission should license all non-cellular CMRS spectrum, except Personal Communications Service spectrum, in the Gulf of Mexico. A copy of the "talk sheet" used in the meeting, which summarizes SOSCo's position vis-a-vis the proceeding, is attached.

William F. Caton
November 12, 1997
Page 2

KELLER AND HECKMAN LLP

Should further information be required, the Commission is respectfully requested to contact the undersigned.

Very truly yours,

A handwritten signature in black ink, appearing to read "Brian Turner Ashby". The signature is fluid and cursive, with the first name "Brian" being more prominent.

Brian Turner Ashby

Enclosure

SHELL OFFSHORE SERVICES COMPANY
LICENSING OF NON-CELLULAR CMRS SPECTRUM IN THE GULF OF MEXICO
WT DOCKET NO. 97-112

- Petroleum and natural gas exploration and production activity in the GOM has increased dramatically in recent years. Experts now predict that the GOM will become the largest oil and natural gas frontier in the U.S. This oil and natural gas is critical to the nation's economy and will decrease dependence on foreign sources.
- The increased activity in the GOM has led to an increase in demand for many types of telecommunications services. The demand for CMRS services, especially SMR services, is particularly acute. The record established in this proceeding documents this demand.
- Telecommunications service providers in the GOM, however, are having difficulty meeting demand in the GOM. There is a dearth of spectrum available because the GOM has not been included in recent spectrum auctions. For instance, it currently is not possible to obtain 800 MHz or 900 MHz SMR licenses in the GOM.
- The Commission should remedy this situation by licensing all non-cellular CMRS spectrum, except PCS spectrum, in the GOM. The licenses for this spectrum should authorize operation throughout the entire GOM, from the beach out to the limits of U.S. jurisdiction.
- The Commission should reject the self-serving arguments of existing land-based and water-based CMRS licensees opposed to the licensing of non-cellular CMRS spectrum in the GOM:
 - Land-based non-cellular CMRS licensees are not authorized to serve the GOM and, if given the authority to do so, will not provide adequate service. At most, these licensees would serve only the coastal portions of the GOM covered by their land-based transmitters. The overwhelming majority of the platforms in the GOM are located well outside this area.
 - There is no credible evidence that land-based non-cellular CMRS licensees will receive interference from water-based licensees because there are no water-based licensees operating in the GOM. Moreover, SOSCo is willing to work with the Commission and land-based licensees to establish workable interference criteria for the GOM.
- While the Commission considers whether to license non-cellular CMRS spectrum in the GOM, SOSCo would like short-term, secondary authority to operate a 20 channel 800 MHz SMR system in the GOM. Operation of this SMR system would clarify whether interference is likely between water-based and land-based SMR providers and could be used to develop workable interference criteria for the GOM.